

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**In re: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION**

Case No. 3:13-cv-5944-SC  
MDL No. 1917

### This Document Relates to:

**DECLARATION OF GABRIEL A. FUENTES IN  
SUPPORT OF LG AND MITSUBISHI DEFENDANTS'  
ADMINISTRATIVE MOTION TO SEAL IN SUPPORT  
OF DEFENDANTS' JOINT MOTIONS FOR  
SUMMARY JUDGMENT.**

*Best Buy Co., Inc., et al. v. Technicolor SA, et al., No. 13-cv-05264;*

Judge: Hon. Samuel Conti  
Date: February 6, 2015  
Time: 9:00 AM  
Crtrm.: 1, 17th Floor

*Electrograph Systems, Inc., et al. v.  
Technicolor SA, et al., No. 13-cv-05724:*

Judge: Hon. Samuel Con  
Date: February 6, 2015  
Time: 9:00 AM  
Crtrm.: 1, 17th Floor

*Interbond Corp. of Am. V. Technicolor SA,  
et al. No. 13-cv-05727:*

Judge: Hon. Samuel Con  
Date: February 6, 2015  
Time: 9:00 AM  
Crtrm.: 1, 17th Floor

*Office Depot, Inc. v. Technicolor SA, et al.,*  
No. 13-cv-05726:

Judge: Hon. Samuel Con  
Date: February 6, 2015  
Time: 9:00 AM  
Crtrm.: 1, 17th Floor

*P.C. Richard & Son Long Island Corporation, et al. v. Technicolor SA, et al., No. 13-cv-05725;*

Judge: Hon. Samuel Con  
Date: February 6, 2015  
Time: 9:00 AM  
Crtrm.: 1, 17th Floor

*Target Corp. v. Technicolor SA, et al.*, No. 13-cv-05686;

Judge: Hon. Samuel Con  
Date: February 6, 2015  
Time: 9:00 AM  
Crtrm.: 1, 17th Floor

1                   *Costco Wholesale Corporation v.*  
2                   *Technicolor SA, et al.*, No. 13-cv-05723;

3                   *Schultze Agency Services, LLC v.*  
4                   *Technicolor SA, Ltd., et al.*, No. 13-cv-  
05668;

5                   *Sears, Roebuck and Co., et al. v.*  
6                   *Technicolor SA*, No. 13-cv-05262;

7                   *Dell Inc., et al. v. Phillips Electronics North*  
8                   *America Corporation, et al.*, No. 13-cv-  
02171;

9                   *Tech Data Corp., et al. v. Hitachi, Ltd., et*  
10                   *al.*, No. 13-cv-00157;

11                   *Siegel v. Technicolor SA, et al.*, No. 13-cv-  
12                   05261;

13                   *Viewsonic Corporation v. Chunghwa*  
14                   *Picture Tubes Ltd., et al.*, No. 13-cv-02510.

15                   **DECLARATION OF GABRIEL A. FUENTES**

16                   I, Gabriel T. Fuentes, declare as follows:

17                   1. I am an attorney licensed to practice law in the State of Illinois, and I am a partner at the  
18 law firm of Jenner & Block LLP, attorneys of record for Defendants Mitsubishi Electric Corporation,  
19 Mitsubishi Electric US, Inc., and Mitsubishi Electric Visual Solutions America, Inc. I submit this  
20 declaration in support of the LG and Mitsubishi Electric Defendants' Administrative Motion to Seal in  
21 Support of Defendants' Joint Motion for Summary Judgment. I have personal knowledge of the facts set  
22 forth in this declaration and, if called as a witness, I could and would testify competently to such facts  
23 under oath.

24                   2. Exhibits A and B to the Declaration of Michael T. Brody filed in Support of LG and  
25 Mitsubishi Electric Subsidiaries' Motion For Summary Judgment should be filed under seal because they  
26 have been identified by Mitsubishi Electric Corporation to contain private or competitively sensitive  
27 information of Mitsubishi Electric Corporation and as a result have been designated as Highly  
28 Confidential pursuant to the Protective Order.

1 I declare under penalty of perjury under the laws of the State of California and the United States  
2 that the foregoing is true and correct.

3 Executed this 7th day of November, 2014 at Chicago, Illinois.

4 /s/ Gabriel A. Fuentes  
5 Gabriel A. Fuentes  
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